

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS**

JING GAO, et al.

Plaintiff,

vs.

BLUE RIDGE LANDFILL TX, LP

Defendant.

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CIVIL ACTION NO. 3:16-cv-00323

**AFFIDAVIT OF PATRICE CHILDRESS IN SUPPORT OF BLUE RIDGE LANDFILL
TX, LP'S MOTION FOR SUMMARY JUDGMENT**

STATE OF TEXAS

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COUNTY OF HARRIS

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BEFORE ME, the undersigned authority, on this day personally appeared Patrice B. Childress, who swore on oath that the following facts are true:

1. My name is Patrice B. Childress. I am over 18 years of age, of sound mind, and fully competent to make this affidavit. I have personal knowledge of the facts stated herein. They are all true and correct.

2. The following exhibits attached to Blue Ridge Landfill TX, LP's Motion for Summary Judgment are true and correct copies of the following:

Exhibit	Description
1	Odor Datasheet from Madison Lowe and Iolanda Lowe
2	Excerpts from the Deposition of Iolanda Ryan-Lowe dated July 11, 2017

Exhibit	Description
3	Odor Datasheet from Barry Nixon and Patricia Nixon dated September 20, 2016
4	Excerpts from the Deposition of Barry E. Nixon dated July 12, 2017
5	Plaintiff's Original Petition filed by Jeff Frank Nadalo et al. against Allied Waste Landfill Holdings, Inc. and Blue Ridge Landfill TX, LP on January 21, 2009
6	Excerpts from the Deposition of Arthur Pierce dated March 23, 2018
7	Excerpts from the Deposition of Jing Gao dated March 23, 2018
8	Excerpts from the Deposition of Alvin Rabsatt dated July 11, 2017
9	Odor Datasheet from Johnnie E. Lewis-Riley dated October 7, 2016
10	Odor Datasheet from Calvin Casher
11	Odor Datasheet from Daniel H. Gonzales and Patricia Gonzales
12	Sampling of Odor Datasheets
13	Odor Datasheet from Craig P. Jackson and Angela Jackson
14	Odor Datasheet from Beverly F. Jacko and Charles A. Jacko
15	Complaint No. 34105 submitted to the TCEQ against Blue Ridge Landfill dated January 30, 2014
16	Complaint No. 84239 submitted to the TCEQ against Blue Ridge Landfill dated November 27, 2006
17	Complaint No. 84026 submitted to the TCEQ against Blue Ridge Landfill dated November 14, 2006
18	Excerpts from the Deposition of Kathryn Pierce dated July 12, 2017
19	Sampling of Complaints submitted to the TCEQ against Blue Ridge Landfill

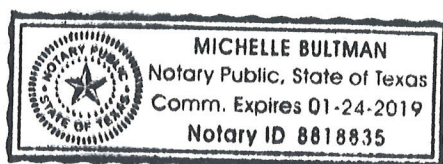
Exhibit	Description
20	Sampling of Complaints submitted to the TCEQ against Akzo Nobel, Brenntag Southwest, City of Pearland, Honghua America, Lone Star Recycling & Disposal, Nalco, Stericycle, and Syntech Chemicals
21	Excerpts from the Deposition of Patricia Nixon dated March 23, 2018

Further, Affiant sayeth not.

SIGNED on August 10, 2018.


Patrice B. Childress

SUBSCRIBED AND SWORN TO BEFORE ME on August 10, 2018, which I certify
by my signature and by the seal of my office.




Notary Public, State of Texas